

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

MAKE THE ROAD NEW YORK, and)
MARTÍN JONATHAN BATALLA VIDAL,)
)
 Plaintiffs,)
)
 v.)
)
 KATHY A. BARAN, Director, California)
 Service Center, KELVIN MEDLOCK, Associate)
 Director, California Service Center, SUSAN M.)
 CURDA, District Director, DONALD W.)
 NEUFELD, Associate Director, Service Center)
 Operations, U.S. Citizenship and Immigration)
 Services, and LEÓN RODRÍGUEZ, Director,)
 U.S Citizenship and Immigration Services)
)
 Defendants.)

**PLAINTIFFS' UNOPPOSED
MOTION TO STAY BRIEFING
SCHEDULE**

CIVIL ACTION NO. 1:16-cv-04756
(NGG) (JO)

Plaintiffs request that this Court stay the current briefing schedule until February 20, 2017. Due to uncertainty regarding the future of the program at issue in this action, Plaintiffs believe a stay of the briefing schedule and resolution of the parties' motions is appropriate. Plaintiffs also propose that the hearing currently scheduled for January 25, 2017 be postponed until briefing is completed. No party will be harmed by suspension of the briefing schedule.

Defendants have indicated that they do not object to suspending briefing until February 20, 2017, and would request that the new briefing schedule allow them 28 days to file their reply.

Dated: New Haven, Connecticut
November 21, 2016

Respectfully submitted,

/s/ Michael Wishnie

Michael Wishnie, Supervising Attorney (MW 1952)
Jerome N. Frank Legal Services Organization
Yale Law School
P.O. Box 209090
New Haven, CT 06511

Phone: (203) 432-4800
michael.wishnie@yale.edu